

## ATTACHMENT A – SPECIFIC BROAD COMMENTS

**Statement of Goals.** The vision statement of the PTIP would benefit from a clear restatement of goals, both for the Trust, and for this planning document. Although the Trust Act directs the Presidio Trust, first and foremost, to protect the Presidio's resources from development while minimizing cost to the United States Treasury, these two equal and essential elements of the Trust Act (Section 101(5) and (7)) are only the foundation for the spectrum of the agency's goals. They provide the basis for the development of a more explicit vision for the Presidio, which would depict the character, appearance and visitor experience that would result from implementation of the plan. As they are also essential agency goals, they should also be readily identifiable throughout the principles and implementation strategies in the PTIP. As an example, the DEIS acknowledges on page 224 that, "In summary, the Draft Plan alternative may have a new adverse impact on the individual historic resources and on the NHLD due to (unspecified) future building demolition, which may exceed demolitions anticipated under the GMPA." The PTIP should make an unqualified commitment to the preservation of the National Historic Landmark District (NHLD) in a vision statement, the PTIP Objectives and Purposes of the DEIS, and the PTIP Planning Principles.

To complete a consistent presentation of the Trust's essential goals, the stated purposes of the PTIP planning effort on page 9 should reflect the equal status that resource protection and minimizing cost hold in the Trust Act, as stated in Section 101 of the Act. The purposes of the PTIP should be restated so that the goal of resource protection is as strongly worded as that of achieving planning flexibility.

**Clarification of the Need for the Process.** Recent financial analysis has shown that the GMPA-based alternative would meet the Trust's requirements for financial self-sufficiency, even using the conservative financial model employed in the DEIS. Given this, a strongly supported justification of need for the PTIP becomes critical. Qualitative information and quantitative data should be provided in the following areas:

- In the DEIS, the Trust states that a new general plan will provide the means to achieve financial self-sufficiency. Yet the same document also finds that the No Action alternative (the GMPA 2000 alternative) meets the Trust's financial goals with fewer impacts on park resources than the Trust's Preferred Alternative (the Draft Plan) (PTIP DEIS S-24). The DEIS discussion of need should address this inconsistency with the stated goals of the Trust Act noted above.
- NPS data supports no financial loss, and some gain, resulting from the premature departure of the Sixth Army during NPS administration of the Presidio, *vis a vis* the subsequent market rate rents received from the replacement, non-military tenants. The Trust should provide data to support the PTIP contention of financial loss resulting from that same circumstance.
- The Trust should include opportunities to supplement agency income with philanthropic contributions.
- The discussion of need states that additional revenues are needed to compensate for the several long-term leases to non-profit tenants that the Trust inherited from the NPS administration. Because non-profits are not necessarily non-market value tenants, the PTIP should further document this loss of income or remove it as a rationale for need.

The PTIP states that the current plan does not allow sufficient flexibility in the selection of tenants. However, flexibility was demonstrated by the Letterman SEIS which showed that amending the existing plan is a feasible process even when a project exceeds the upper limits set in the adopted plan. The key feature of the GMPA that would be difficult to amend is the upper square footage limit of development. If this is the flexibility that the discussion of need refers to, that discussion should address why the Trust requires a higher upper limit.

**Use of a Programmatic Approach.** In the NPS planning process, (Management Policies 2.3.1 and 2.3.3), a programmatic document would be developed as a "first cut" at management actions. Its purpose would be: "to ensure that a park has a clearly defined direction for resource protection and visitor use...it will focus on why the park was established and what management prescriptions should be achieved and maintained over time (2.3.1)." The PTIP is presented as a programmatic look at alternatives and impacts (DEIS p.1), however, it also clearly states that many projects will proceed directly to leasing and

implementation after PTIP adoption. This combines a programmatic general plan with authority for implementation of unlimited, and currently unspecified, actions.

Even though the Trust believes a flexible approach to planning is warranted, we suggest that a certain level of specificity must be provided in the EIS analysis. For example, the upper and lower limits of a reasonable range of demolition, new construction, restoration, etc. for each alternative is necessary. Because it is critical to know where impacts will occur, each alternative must include the location of all the potential demolition, construction, and restoration, for each end of this range. This should be possible given the level of information on nearly every aspect of the Presidio's physical, cultural and social setting presented in the DEIS Affected Environment chapter (DEIS p. 71-218).

In order to be able to move directly into actions such as long-term leasing (PTIP p. 134) after the PTIP is adopted, the NPS recommends that the Trust modify the PTIP and DEIS. The modified PTIP document should define agency goals and principles supporting a Presidio-wide vision, outline the subsequent planning processes and provide sufficient detail to allow assessment of impacts to park resources and to discern the character of the planning districts.

**Future Public Planning Processes.** As directed by the Council on Environmental Quality (CEQ), programmatic documents broadly assessing the affected environment and cumulative effects of a program are to be followed by site-specific or project-specific NEPA documents (CEQ, 40Q, 24). The DEIS does describe a commitment to future, specific plans (page 1) but that commitment is weakened by the text that immediately follows, which provides opportunities for a range of actions that do not require public review:

“More detailed and site-specific, district-level, and/or issue-oriented plans will be developed in the future based upon the direction established in the final Plan. Some individual projects that are consistent with PTIP could proceed immediately, likely without need of environmental review beyond the PTIP EIS. At this time, it is anticipated that these projects would primarily include (1) cultural programs and special events; (2) long-term leases involving no new construction or demolition of historic resources, where uses are identified as “preferred” within the PTIP planning guidelines; and (3) natural resource restoration efforts that are consistent with both the PTIP and the VMP.” (DEIS Page 1).

This section of the PTIP presents the area of greatest concern for the NPS, due to the number of structures that could be made available for immediate long-term lease after the PTIP is adopted. Consider the application of this process to the planning districts of Crissy Field and the Main Post, where “Preferred...uses would include...”(PTIP p. 86 and 92):

Main Post: cultural/educational, office, lodging, small-scale conference, recreation, residential, supporting retail services, and existing administrative and operational functions.

Crissy Field: museums, visitor and cultural facilities, educational programs, recreation, lodging, cafes, and meeting space.

The terminology “preferred uses include”, as opposed to “designated land uses are”, allows a potentially wide range of commercial, office and service uses for the Main Post and Crissy Field. In order to proceed to implementation, the DEIS or a subsequent planning process should provide enough information to the public so that the effect of such long-term leases and specific uses on the overall development of the district and park can be judged.

The PTIP and DEIS provide little specific information to the public on the subsequent planning processes referred to in the documents. Thus, it is difficult to determine what future implementation activities have been adequately assessed by the DEIS. The Trust should provide additional clarification to establish the clear threshold for when a public environmental review would be triggered by Trust actions. For example, would the demolition of Baker Beach or Tennessee Hollow non-historic housing, or construction of replacement housing in a non-historic area trigger a subsequent environmental review process? Would

district planning occur before long-term leases are granted or only at a point when new construction or demolition in the district is proposed?

The only firm standard listed for future environmental review is mitigation measure CR-4 which states: "The Trust would complete additional planning prior to implementation of any project proposing demolition or new construction that could result in a new adverse effect on historic resources." According to this measure, new construction or demolition that, by the Trust's own internal assessment, would not result in a new adverse effect on historic resources would not necessarily trigger environmental review. If the intent of the Trust is to complete a public planning process for each demolition and new construction in the Presidio, a mitigation measure describing this commitment should be added to the plan. The Trust should clearly state now which reasonably foreseeable projects, such as known demolition and construction, and which planning processes will proceed directly from the PTIP and present a preliminary schedule for them. To ensure an orderly planning process the NPS recommends that, prior to long-term leasing, the Trust either modify the PTIP as stated above or move directly to district planning.

**Preparation of the Comprehensive Management Program.** The Trust is required by 16 USC 460bb Section 104(c) to develop a comprehensive program for management of the lands and facilities in Area B. There are four required components of the program:

- 1) demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated, and which are identified in the GMPA for demolition,
- 2) evaluation for possible demolition or replacement those buildings identified as categories 2 through 5 in the Presidio of San Francisco Historic Landmark District Historic American Buildings Survey Report, dated 1985,
- 3) new construction limited to replacement of existing structures of similar size in existing areas of development, and
- 4) examination of a full range of reasonable options for carrying out routine administrative and facility management programs.

In the PTIP, the Trust states that the foundation of the comprehensive management program is established in the PTIP but will not be addressed by any single document or plan. The program will consist of a number of documents or plans that incorporate the Trust's on-going management practices, operating procedures, policies and programs. This range of plans, programs and processes, developed over time, would constitute the comprehensive management program. (PTIP p.141)

The crucial requirement of the comprehensive management program is the full evaluation of all possible demolition, particularly of historic structures, and new construction in the park. This evaluation should be completed as part of the PTIP in order to provide an assessment of cumulative effect to the NHL status and should address both historic structures and cultural landscapes.

Although the 1985 HABS report is required by the Trust Act to evaluate whether the historic structures are economically viable for rehabilitation, the 1993 update of the San Francisco National Historic Landmark District is the base document for determining which historic structures contribute to the NHL. Use of the update would allow a reasoned, comprehensive assessment of impacts to park resources and would strengthen the Trust's commitment to preservation of the NHL status.

**Range of Alternatives and Level of Development.** The NPS suggested in our comments during PTIP scoping (June 4, 2001) that the Trust examine the GMPA and develop an alternative that makes the minimal modifications necessary to the GMPA to allow the Trust the planning flexibility it feels is warranted. The PTIP states that the Preferred Alternative (Draft Plan alternative) represents these minor modifications (PTIP p. 30-31, DEIS p. 16, 407,408). We disagree, and feel that the range of alternatives in the DEIS continues to present unnecessarily high levels of development for the Presidio. The NPS encourages the Trust to modify an alternative to have a level of effect similar to or less than the No Action alternative. This would provide a more reasonable range of alternatives for public consideration.

**Descriptions of Alternatives.** Although the CEQ allows a separate plan and EIS document, the EIS must be detailed enough to stand on its own; the plan is considered “technical backup” (see 40 Questions, #21). NEPA regulations require that the impacts of alternatives be analyzed in sufficient detail so readers “may evaluate their comparative merits.” (40 CFR 1502.14). The level of description of the alternatives in the DEIS is at such a conceptual level that it makes it difficult to compare, or understand, their relative technical, logistical, economic or environmental similarities or differences.

All DEIS alternatives should be described fully, and in equal detail, in order to evaluate their relative ability to achieve the PTIP Planning Principles and the overarching Trust goal of sustainability (PTIP p. 20). The alternatives should describe further the desired future conditions for each planning area, identify the historic structures within each that would be evaluated for possible demolition, provide more specificity on the uses proposed for structures to be leased and identify areas where new construction would likely be sited. These areas should be logically tied to the level of demolition and new construction for each alternative and each planning district. In addition, an explanation should be provided describing the development of the building caps, demolition caps, etc. in Appendix J. Finally, to effectively compare and contrast the PTIP alternatives in a meaningful way, the DEIS Summary should include a table that compares the critical components of each alternative, i.e., the levels of demolition, new construction, overall square footage, etc. The NPS requests that the DEIS discussion of alternatives be revised as described.

**Impacts Analysis.** We believe that the DEIS does not adequately address potential effects to park resources or the visitor experience and is incorrect in many of the conclusions of the potential for impact. The DEIS should analyze and compare the differences of action alternatives with respect to their consistency with the park purpose and objectives, and compare the quality of visitor experience, impacts on park resources, short- and long-term costs, and environmental consequences that may extend beyond park boundaries, to the No Action alternative.

In summary, the DEIS would benefit from inclusion of the following components:

- 1) A clear and consistent summary of relative effects of the PTIP alternatives as compared to the GMPA 2000 alternative, with the level of effect described using standard NEPA terminology. The conclusions in the Summary Table should not conflict with the conclusions in the Environmental Consequences chapter.
- 2) The designation of thresholds above which an impact would be considered as having an adverse effect on the environment. The thresholds should be defined in the methodology section of each issue area. Of the 37 impact topics listed in the Summary Table, thresholds are provided for only 4 topics (wastewater, natural gas, energy conservation, and Trust operations).
- 3) The DEIS should assess each alternative as to its effectiveness in meeting the stated objectives in the DEIS.
- 4) The DEIS should discuss and assess the effectiveness of the mitigation measures in avoiding or reducing the level of potential effect. For example, the PTIP Planning Principles and District Guidelines are to be relied on to mitigate impacts to cultural resources (CR-4) but an assessment of the effectiveness of these principles and guidelines is not performed.
- 5) The DEIS should describe the current range of visitor experiences in the Presidio and assess the changes the visitor could experience from implementation of the PTIP alternatives. The visitor experience is a broader concept than simply the provision of events and programs – the experience involves a range of types, levels and values that range from large scale events to small interpretive programs to the enjoyment of solitude.
- 6) The NPS is very concerned about potential impacts to lands under our administration. The DEIS should assess the impacts of the PTIP alternatives on Crissy Field within Area A as compared to the No Action alternative (GMPA 2000 alternative). Impacts assessed would include changes to the NHLD integrity, the cultural landscape, the visitor experience, Crissy Marsh expansion, recreational opportunities, parking, overall traffic volumes and background noise levels.

- 7) The DEIS should include a discussion of methodology used to investigate the potential for effect for each of the 37 impact topics. For example, methodology explaining how conclusions of impact were reached are lacking many impact topics such as historic architectural resources, cultural landscapes, archaeology, water quality, visual resources, visitor experience, parking, bicycle and pedestrian circulation, transit services, construction traffic and storm drainage.
- 8) The level of detail in the analysis of impacts does not reflect the level of specific information on square footage of new construction, total construction, amendments needed to vegetation management plan zoning, encroachment on native plant communities, etc. that are expressed in the PTIP and DEIS alternatives.
- 9) DEIS does not assess impacts of PTIP alternatives on Area A, including parking, traffic, cultural resources and visitor experience.

With the broad latitude of possible development allowable in each PTIP planning district under the action alternatives, and the unlimited overall scenarios this could produce, the DEIS in its present form does not provide evidence needed for an effective assessment of impact. The detailed comments in Attachment D to this letter demonstrate many of the above recommendations and correct deficiencies in the DEIS.

The NPS recommends that the DEIS be modified to present a complete assessment of impacts, with firm mitigation standards, that would include, but not be limited to the NHL, visitor experience, transportation, parking, scenic resources, resources of Area A, and future marsh expansion.

**Level of Commitment.** The DEIS on page 1 states that “Adoption of the PTIP does not constitute a commitment to any specific development projects, construction schedules, or funding priorities, but instead will establish a policy framework to guide future Trust Actions.” However, the PTIP clearly states that, following the adoption of the PTIP, the Trust would proceed to long-term leasing of historic and non-historic structures and other projects. To allow implementation of these “unspecified” Trust actions to be assessed, adequate protections for park resources and the visitor experience must be in place in the PTIP and adopted through the Record of Decision for the document. In place of details of the Plan development, the policies in the PTIP must function as clear agency commitments to assure that if impacts cannot be avoided, actions will not be adopted. For example, commitment to preservation of the NHL status is included in the community assurances and the Planning Principles, but these are not adopted as a commitment or policy by the Trust. In light of the conceptual nature of the PTIP, and the potential for adverse effect to the NHL, a firm and clear commitment to the preservation of the integrity of the NHL should be adopted by the Trust through the Record of Decision. This commitment should be expressed as mitigation and as a fundamental element of the PTIP goals, purpose and objectives.

The NPS recommends that the community assurances, Planning Principles, and District Guidelines in the PTIP be assessed to demonstrate to the public the level of effectiveness to be expected in protecting park resources and the visitor experience during PTIP implementation. If not found effective, they should be strengthened, and adopted to become enforceable as mitigation.

**Tenant Selection.** The PTIP tenant selection criteria are:

- 1) compatibility with PTIP planning principles and preferred uses articulated in PTIP planning district guidelines;
- 2) demonstrated ability to fund necessary building improvements and contribute to the Presidio’s financial sustainability; and
- 3) responsiveness to park program themes and contribution to the visitor experience. (PTIP page 140).

Although the Trust Act does state that priority should be given to those tenants that “enhance the financial viability of the Presidio...” (Section 104 (n)), this may make it more difficult to develop a “dynamic community where programs and activities serve, inform and educate visitors from near and far”(PTIP p. iii). Though a financial proposal can be a baseline requirement for tenant suitability, the next level of the selection process should address the contribution of the tenant to the realization of the park vision

through delivery of distinctive programs. This would allow a greater possibility of tenants who would become actively involved in the mission and community of the park, which would in turn allow more interaction between tenants and park visitors. An ultimate result could be greater accessibility to the historic structures, which were the basis for the Presidio being chosen for inclusion in the national park system.

The NPS recommends that the Trust give stronger weight to the programmatic contribution element of the selection criteria and consistently state those criteria throughout the PTIP.

**Preservation of the Presidio National Historic Landmark District.** The PTIP focuses on the need for flexibility in planning, yet the lack of information provided in the PTIP and DEIS have not allowed a complete assessment of potential effect on the NHL. Totals of square footage demolished or built in each planning district are presented in the DEIS, but without information as to which buildings contribute to the overall figures, the preservation of the NHL cannot be assessed. If the NHL status were lost, this could threaten the continuation of the Presidio as a part of the national park system.

As required in the comprehensive management program (16 USC 460bb §104(c)(1)), the Trust must remove buildings identified for demolition in the GMPA unless these structures can be cost-effectively rehabilitated. A second requirement of the comprehensive management program is an evaluation of those structures listed in categories 2 through 5 in the Presidio of San Francisco National Historic Landmark District Historic American Buildings Survey (HABS) that could be considered for demolition. These requirements, and the potential locations of new construction, should be depicted in the PTIP in a Presidio-wide graphic and in the graphics for each planning district. This would constitute disclosure of the full range of possible demolition and construction and allow an assessment of a worst-case scenario given the maximum demolition and construction caps. This is essential for determining the cumulative potential impact on the status of the Presidio as a NHL.

Mitigation measures CR-1 through CR-4, and CR-7, are proposed to address the potential adverse effect on the NHL. Mitigation measure CR-4 is the strongest of the five and calls for plans to conform to PTIP Planning Principles, PTIP Planning District Guidelines, and the Secretary of the Interior's Standards, to the maximum extent feasible. However, the DEIS contains no evaluation of the effectiveness of those measures in reducing or avoiding adverse impacts and there has been no separate assessment process that has reviewed the adequacy of the PTIP Planning Principles or Planning District Guidelines in protecting the cultural resources of the district.

In the PTIP "mitigation measures are set up to provide standards, monitoring and other broad requirements that would be applied to future projects" (PTIP DEIS p. 238). Mitigation for cultural resource impacts of a broad programmatic document should set the standard that all new construction and demolition will be proposed in a manner that assures the preservation of the integrity of the NHL. Those projects that cannot meet this standard will be modified until the standard can be met, or removed from consideration. An example of such a project would be the removal of the Public Health Service Hospital, which the PTIP states would not affect the integrity of the NHL. The integrity of the district would be significantly affected by this action, which would be an unmitigatable adverse effect. Demolition of historic buildings should be considered only as a last resort and only on a case by case basis; this is not a sustainable activity.

The Presidio Trust should adopt a firm and unqualified policy to protect and preserve the NHL status and demonstrate this commitment through a comprehensive assessment of potential effects that will identify a development scenario that supports the commitment. Also, the cumulative assessment of effect on the NHL must consider the potential loss of the Presidio of San Francisco NHL in a state and national context.

**Housing.** The NPS recommends that the Trust reconsider its new policy of "no net loss of housing" for the Presidio (PTIP p. v). A significant concern for the NPS is that new construction used to satisfy the stated jobs/housing balance would contribute to the level of development that has already been noted as a threat to the NHL status of the Presidio. This supports our recommendation that the Trust rely on

existing structures to provide any housing that is required as part of the PTIP. Conversion of non-residential buildings to residential, or subdividing large units to smaller ones where compatible with historic preservation guidelines, should be used to meet housing goals. New construction for housing should be considered only as a last resort when reasonable alternatives are lacking, and should be limited to replacement of removed historic structures such as the Letterman Hospital finger wards or other locations not in conflict with natural resource management goals.

The NPS recommends that residential uses at the Presidio be restricted to existing structures, that the Trust must provide housing at a full range of pricing to match the Presidio workforce pay scales to support the goal of sustainability, and that housing areas proposed for removal be phased out as soon as financially possible to allow for parkland restoration.

**Financial Model.** The DEIS financial models of the alternatives appear to unrealistically overstate expenses (e.g. assumption by the Trust of all rehabilitation costs), understate revenues (e.g. overly conservative rent levels and omission of interest income), and in all but two of the alternatives, substantially increase the revenue requirement with a significant expense for programs, which are not mandated by the Trust Act.

The financial assumptions used in the PTIP are overly conservative. For example, the Trust assumes that it must fund all rehabilitation although it is reasonable to assume that private investors may assume some of these costs under a ground lease scenario (e.g. Buildings 38 and 39) which would allow for capture of investment tax credits for historic building rehabilitation. Such conservative assumptions, combined with the understated revenue projections and inflated operating expenses for programs, could potentially influence the level of demolition and new construction to meet the requirement for self-sufficiency. This possible need for new construction threatens the ability of the Trust to meet one of its essential mandates – to preserve the Presidio's cultural and natural resources. Additionally, if the NHL status of the Presidio is lost due to the effect of new construction and loss of contributing structures, so too could the ability to finance historic building rehabilitation through tax credits in the future, and retroactively, threaten tax credits already claimed by third parties for completed rehabilitation.

The Trust should reconstitute the financial models, giving equal treatment to the alternatives in the timing of Wherry housing removal and using appropriate levels of expenses in the GMPA2000 alternative (e.g. non-residential revenue projections, program capital and planning expenses). The NPS recommends that, for each alternative, the Trust factor in the potential for some philanthropic funding for programs and park improvements in the financial models, and include in parkwide expenses a base level of funding for programs, museum collections and natural resource projects such as the native plant nursery and revegetation projects. We further recommend that the models be based on the stated mandates of the Trust Act to conform to the GGNRA enabling legislation, the general objectives of the GMPA and the need to manage the resources of the park.

**Programs.** The NPS supports the Trust's vision of a "...palette of program opportunities designed to create a compelling park experience for local, national and international visitors." that can be created through partnerships with the NPS, tenants, schools and cultural institutions. (PTIP page 64). The provision of programs through a variety of sources would allow the possibility of significant visitor interaction with tenants, introduction of a broad range of activities and viewpoints, an increase in visitor access to the historic structures, and expression of the concept of "a global center for exchanging ideas on critical environmental and societal challenges." (GMPA p. 24). In comparison, if the Trust relies only on agency generated programs and sources, the programs provided could lack the diversity envisioned in the GMPA, and enthusiastically embraced by the public during that planning process.

The return to a focus on tenants for provision of programs would also address a related NPS concern that the increase in the level of programs envisioned in the PTIP could influence the level of new construction and demolition in the Presidio, in the quest for increased revenues. "Under the PTIP, program quality and quantity would depend on the Trust's ability to generate lease revenue, as well as the extent of philanthropic support received for Trust and National Park Service programs." (PTIP p. 73) But, since the Trust has limited expectation of philanthropic support, it is reasonable to assume that lease revenues will

be the major funding source for programs. The NPS position is that the desire for a specific type and level of programs should not be the rationale for an increased level of development in the Presidio.

The NPS looks forward to working with the Trust to identify a list of specific cultural institution concepts that could be included in the PTIP, that would carry out the essential themes of the Presidio. We believe such a list would serve to enhance the final plan. The NPS supports the continued development of a collaborative approach to interpretive and program services between the Trust and the NPS, emphasizing partnerships and the contributions of the park tenants as an integral part of the effort to develop the spectrum of programs in the Presidio.

**Concentration of Visitor Activity.** Historically, the Main Post has always been the heart of the Presidio, and under the GMPA, the Main Post was to “remain the center of Presidio community and the focus of activities” (GMPA p. 58). The PTIP has changed that focus to emphasize Crissy Field as the principal location where park visitors would be welcomed inside Presidio structures, primarily museums, hotels, meeting spaces, and cafes, while the Main Post is noted as a “...backdrop for visitor programs and ...a setting for businesses, organizations and Presidio community services.” (PTIP p. 85) The GMPA saw the Main Post, not as a backdrop, but as an area where “Much of the interior space...will be devoted to activities that involve the visiting public.” (emphasis added) (GMPA p. 61)

The shift of the bulk of cultural and community programs from the Main Post to Crissy Field in the PTIP presents a major change in visitor experience from the current plan. Visitors would be primarily restricted to the exterior areas of the Main Post and drawn to the attractions along Mason Street. This concentration of public use in the narrow corridor along Mason Street would change the existing low-intensity character of the Presidio waterfront, which provides a needed escape from urban pressures that only open space can provide.

NPS urges the Trust to reconsider the focus of visitor activity in Area B, to lessen the impacts on Area A of Crissy Field, and complete a comprehensive Crissy Field Area B district plan prior to committing to long-term leases throughout the district.

**Level of Development at Crissy Field.** The character and intensity of development proposed by the PTIP south of Mason Street is at odds with the new park experience at Crissy Field in Area A. Crissy Marsh, the restored Crissy (air) Field, the beaches cleared of rubble and wide promenade are the result of years of stewardship, partnership and public planning. The total of 690,000 square feet of buildings south of Mason Street (PTIP p. 95) allowed in the PTIP, 80,000 square feet more than the present level of development and 300,000 square feet more than envisioned in the GMPA (NPS-Presidio Building Data Base), has the potential to change the Presidio's northern waterfront from an area of respite from urban pressures to an extension of the City itself. Additionally, the concentrated and significant level of development in this area alone has the potential to adversely effect the NHLD.

The NPS recommends that the level of development in the Crissy Planning District be significantly lowered from the level in the PTIP and that a district planning effort address this distinct historic area and inform the public as to plans for historic preservation, demolition, new construction, land use, tenant selection, traffic, public access, etc., prior to committing to any long term leases. The NPS also recommends that the Trust consider a development option for Area B of Crissy Field that would not expand the built environment nor duplicate commercial services found just outside the Presidio gates.

**Expansion of Crissy Marsh.** The NPS supports the Trust's commitment to the value of Crissy Field Marsh. The DEIS discussion of Crissy Field tidal marsh expansion through future site planning and analysis (PTIP p. 32 and NR-10, PTIP DEIS p. 259) should be clarified to note that a feasibility study was completed in 1995 and 1996, and that marsh expansion is feasible. The next step toward realization of this goal should be a Crissy Marsh alternatives assessment to identify where marsh expansion can occur. The NPS and the Trust have initiated discussions to work together on this study.

The PTIP clearly states that the Trust could immediately execute long-term leases for the both historic and non-historic structures on Crissy Field in Area B which could significantly constrain or preclude marsh



expansion in that area. The PTIP must allow for the continued ecosystem health and functionality of the existing marsh by strengthening the commitment expressed in Mitigation Measure NR-10.

The NPS recommends that the areas to be studied for potential marsh expansion, including Tennessee Hollow, be designated and set aside as a special management area within the planning districts. The special management area boundary would be shown in the planning district maps. Only short-term leasing would be allowed within the area until the results of future planning are known.

**Tennessee Hollow Planning District.** The NPS commends the Presidio Trust's commitment to preservation of the Tennessee Hollow watershed. However, the Tennessee Hollow restoration area is currently split between four planning districts. To better plan for preservation of its complete ecosystem, the Tennessee Hollow watershed should be combined into one resource-based planning district.

**Resource Consolidation Concept.** The NPS does not consider the near-term removal of the East and West Washington housing a high priority. If the Trust does consider the removal of housing on Washington Blvd., the following factors should be taken into consideration.

- 1) The East Washington housing was constructed in 1948, and should now be evaluated for possible inclusion as contributing to the NHL.
- 2) Buildings should be removed only to restore native habitats or historic forest and maintain trail access on the historic road alignment.
- 3) The removal of Washington Blvd. housing should not trigger additional new construction.
- 4) Removal of buildings should give priority to those that will allow restoration of important serpentine grassland habitat and forest zones.
- 5) The priority of restoration of native habitat in this area should be considered in context of other habitat restoration projects in the Presidio.
- 6) Traffic impacts of closing Washington Blvd. should be fully evaluated.

**Transportation Demand Management.** The Transportation Demand Management (TDM) program presented in the PTIP should be more aggressive in its automobile trip reduction goals; in its present form, the program would attract cars at roughly twice the rate of the rest of San Francisco. The NPS recommends that the elements of the TDM Program be more ambitious. Specifically, the NPS suggests that the TDM:

- 1) Focus on the morning weekday peak period and weekend, midday auto traffic reduction, since key roadways leading to and through the Presidio are already at capacity over an extended morning peak.
- 2) Develop a transit system that is attractive to potential riders, specifically - provide express transit service connecting the Transbay Terminal, one of the downtown BART stations, and key Golden Gate Transit stops to various key locations in the Presidio and a connection from the Golden Gate Bridge Toll Plaza (or new Doyle Drive intermodal facility) to various points in the Presidio.
- 3) Maintain direct responsibility for providing good transit rather than passing this along to tenants. Economies of scale suggest that the Trust should take overall responsibility for providing transit, similar to the other Presidio utilities such as water and power.

**NPS/Trust Facility Needs.** The PTIP should commit to the requirements of a museum collections facility to allow the NPS and Trust to comply with the legal requirements for federal collections in CFR Title 36, Part 79, and other collections requirements. The Trust should identify the size and physical requirements for a candidate structure, alternative buildings under consideration, and possible site locations for a new facility. The PTIP also should clearly identify the other operational facility needs of both the Trust and the NPS, which include buildings, parking and the proposed transit hub.

**NPS Area B Responsibilities.** Section 102 (b) of the Trust Act states: "The Secretary shall be responsible, in cooperation with the Presidio Trust, for providing public interpretive services, visitor orientation and educational programs on all lands within the Presidio." The PTIP should acknowledge in

the description and analysis of all the alternatives these NPS responsibilities that are required by the Trust Act. The PTIP should clarify the cooperative effort between our agencies relating to these responsibilities.

**NPS Visitor Center.** The Trust Act specifically placed Building 102 under the management of the NPS to house the William Penn Mott Visitor Center. The NPS has not considered relocating the visitor center from Building 102. Areas of the Presidio under the jurisdiction of the NPS are not under the purview of the PTIP; thus references to moving the visitor center should be deleted.

**NPS Management Policies.** The Presidio and all other national parks are held in trust for the people of the United States. The status of the Presidio as a national park creates a public expectation for a higher level of planning, preservation and provision for public access than that of other public lands. Specific directives are codified in the NPS's Management Policies, which are framed by the intent of protecting resources against impairment that could result from changes in land use or development. NPS has been directed to scrutinize actions within or affecting the national parks to maintain this standard of protection and urges the Trust to also assume this public responsibility and prevent the impairment of national park resources. The NPS encourages the Presidio Trust to adopt NPS management policies and enable our agencies to join in a united and complementary approach to managing a national park.